

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

DINÉ CITIZENS AGAINST RUINING OUR)	
ENVIRONMENT, <i>et al.</i> ;)	
)	Case No. 1:19-cv-00703
Plaintiffs,)	
)	
v.)	PLAINTIFFS’ MOTION TO
)	EXCEED THE PAGE LIMIT
DAVID BERNHARDT, <i>et al.</i> ;)	FOR EXHIBITS
)	
Federal Defendants.)	
)	

Diné Citizens Against Ruining Our Environment, San Juan Citizens Alliance, Sierra Club and WildEarth Guardians (collectively “Citizen Groups”) move for an exception to the local rules regarding page limits for exhibits to motions, D.N.M. LR-Civ. 10.5, and respectfully request the Court grant Citizen Groups’ motion to exceed exhibit page limitations for their July 31, 2019 Memorandum in Support of Motion for Temporary Restraining Order and Preliminary Injunction.

Citizen Groups have reached out counsel for Federal Defendants on this matter, and they have not responded with their position prior to the filing of this motion.

The exceedance of exhibit page limitations is necessary to provide the Court with information needed to decide the associated Motion. This case challenges 32 separate environmental assessments (“EAs”) and findings of no significant impact (“FONSI”) prepared by the Bureau of Land Management to support the approval of 255 applications for permit to drill (“APDs”) oil and gas wells across the Greater Chaco Landscape. Citizen Groups exhibits include six member declarations describing the irreparable harms suffered as a result of Mancos Shale drilling and fracking, four declarations by organization leaders regarding the issue of

bonding, as well as all 32 EAs challenged in this case. Each exhibit is necessary for the Court to make an informed decision regarding Citizen Groups motion for preliminary relief.

Accordingly, Citizen Groups' request this Court grant their motion to exceed the exhibit page limitations provided by Local Rule.

Respectfully submitted this 1st day of August 2019,

/s/ Kyle J. Tisdel
Kyle J. Tisdel
WESTERN ENVIRONMENTAL LAW CENTER
208 Paseo del Pueblo Sur, Suite 602
Taos, New Mexico 87571
(p) 575.613.8050
tisdel@westernlaw.org

/s/ Julia Guarino
Julia Guarino
WESTERN ENVIRONMENTAL LAW CENTER
208 Paseo del Pueblo Sur, Suite 602
Taos, New Mexico 87571
(p) 575.224.6205
guarino@westernlaw.org

Counsel for Plaintiffs

/s/ Daniel Timmons
Daniel Timmons
WILDEARTH GUARDIANS
301 N. Guadalupe Street, Suite 201
Santa Fe, NM 87501
(p) 505.570.7014
dtimmons@wildearthguardians.org

/s/ Samantha Ruscavage-Barz
Samantha Ruscavage-Barz
WILDEARTH GUARDIANS
301 N. Guadalupe Street, Suite 201
Santa Fe, NM 87501
(p) 505.401.4180

sruscavagebarz@wildearthguardians.org

Counsel for Plaintiff WildEarth Guardians

/s/ Karimah Schoenhut

Karimah Schoenhut (D.C. Bar No. 1028390)
(appearing by association with Federal Bar
member Kyle J. Tisdell pursuant to L.R. 83.3(a))
SIERRA CLUB

50 F Street NW, 8th Floor

Washington DC 20001

(p) 202.548.4584

karimah.schoenhut@sierraclub.org

Counsel for Plaintiff Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing MOTION TO EXCEED THE PAGE LIMIT FOR EXHIBITS was served on all counsel of record through the Court's ECF system on this 1st day of August 2019.

/s/ Kyle Tisdel